

MICHAEL S. DEVORKIN (*pro hac vice*)
JACQUELINE G. VEIT (*pro hac vice*)
GOLENBOCK EISEMAN ASSOR BELL & PESKOE LLP
437 Madison Avenue
New York, New York 10022
Telephone: (212) 907-7300
Facsimile: (212) 754-0330
Email: mdevorkin@golenbock.com
Email: jveit@golenbock.com

Attorneys for the Plaintiff,
Gerard A. McHale, Jr., P.A., Liquidation Trustee

JEROME N. LERCH (CSB #48194)
DEBRA STEEL STURMER (CSB #105276)
LERCH STURMER LLP
333 Bush Street, Ste. 2020
San Francisco, California 94104
Telephone: (415) 217-6340
Facsimile: (415) 217-2782
Email: jlernch@lerchsturmer.com
Email: dsturmer@lerchsturmer.com

Attorneys for Defendant Silicon Valley Law Group

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA -
SAN FRANCISCO DIVISION

GERARD A. MCHALE, Jr., P.A., as
Liquidation Trustee for the 1031 Debtors
Liquidation Trust,

Plaintiff,

v.

SILICON VALLEY LAW GROUP, a
California Law Corporation,
Defendant.

CASE NO. CV10-4864 (JCS)

**STIPULATION AND PROPOSED ORDER
TO FURTHER MODIFY THE CASE
MANAGEMENT AND PRETRIAL
ORDER, DATED SEPTEMBER 5, 2012**

WHEREAS, the final Pretrial Conference is scheduled for March 15, 2013; and

1 WHEREAS, the Court's Order entered September 5, 2012 ("Order"), required the
2 parties to file objections to: (i) exhibits not less than ten days before the Pretrial Conference (March
3 5, 2013) (Order § III(B)), and (ii) designations at least ten calendar days before the Pretrial
4 Conference (March 5, 2013) (Order § III(T)(3)); and

5
6 WHEREAS, pursuant to a stipulation to modify the Order, entered into between the
7 parties on September 25, 2012 and so ordered by the Court on September 26, 2012, the parties
8 agreed to shorten the deadlines to file objections to exhibits and designations to December 19,
9 2012; and

10
11 WHEREAS, Parties' Oppositions to Other Side's Motions *In Limine* and
12 Defendant's motion for partial summary judgment are due on December 19, 2012, (*See* September
13 25, 2012 and November 16, 2012 orders); and

14
15 WHEREAS, a hearing on *in limine* motions, disputed items of testimony and
16 exhibits, is scheduled for January 25, 2013; and

17
18 WHEREAS, given the upcoming holidays and the deadlines for the opposition
19 papers to the pending motions, the parties agree that they will not have sufficient time to complete
20 and file their respective objections to exhibits and designations by the revised earlier December 19,
21 2012, deadline, and agree to extend that deadline but still leave sufficient time before the January
22 25, 2013, hearing.

23
24 The undersigned parties hereby agree to further modify the Order and extend the
25 deadline to file objections to exhibits and designations from December 19, 2012, to January 15,
26 2013, which is ten days before the January 25, 2013 hearing.

1 DATED: November 21, 2012

GOLENBOCK EISEMAN ASSOR
BELL & PESKOE LLP

By: /s/ Michael Devorkin

Michael S. Devorkin, Esq. (*pro hac vice*)
Jacqueline G. Veit, Esq. (*pro hac vice*)
Attorneys for Plaintiff Gerard A. McHale, Jr.,
P.A., as Liquidation Trustee for the 1031
Debtors Liquidation Trust

8 DATED: November 21, 2012

LERCH STURMER LLP

By: /s/ Debra Steel Sturmer

Jerome N. Lerch, Esq.
Debra Steel Sturmer, Esq.
Attorneys for Defendant Silicon Valley Law
Group

15 **IT IS SO ORDERED.**

17 Dated: 11/30/12

